

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

IN THE MATTER OF THE CIVIL
FORFEITURE OF \$459,890.00 IN
UNITED STATES CURRENCY

Case No. 6:22-CV-

AFFIDAVIT IN SUPPORT OF CIVIL FORFEITURE

I, Burton Reavis, after being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with Homeland Security Investigations (HSI) under U.S. Immigration and Customs Enforcement (ICE) within the U.S. Department of Homeland Security (DHS). I have been employed as a Special Agent since March 2009. I have 26 years of law enforcement experience, including 13 years as a Special Agent with HSI. I am currently assigned to the HSI Resident Agent Office in Tyler, Texas. I completed the Texas Peace Officer Basic Certification Course at the East Texas Police Academy in 1997 and completed the ICE Special Agent Training Course at the Federal Law Enforcement Training Center in 2009. I have attended numerous training and legal update classes, including training in financial investigations. I am an “investigative or law enforcement officer of the United States” within the meaning of 18 U.S.C. § 2510(7), in that I am an agent of the United States authorized by law to conduct investigations of, and make arrests for, federal offenses, including those referenced in this affidavit.

2. The statements contained in this affidavit are based in part upon my experience, my knowledge of the facts and circumstances surrounding this investigation,

and on information provided to me by other law enforcement personnel and other witnesses. This affidavit does not set forth all of my knowledge about this matter.

PROPERTY TO BE FORFEITED

3. This affidavit is made to obtain the civil forfeiture of \$459,890.00 in United States Currency (hereinafter referred to as the “Seized Property”) which was seized from Grabiél GALICIA-Mateo.

LEGAL AUTHORITY FOR SEIZURE

4. Based on my experience and the information contained in the subsequent paragraphs, I have probable cause to believe that this property is subject to seizure and forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) because the property constitutes or is derived from proceeds traceable to a violation of any offense constituting “specified unlawful activity,” or a conspiracy to commit such offense.

5. Any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of any offense constituting “specified unlawful activity,” or a conspiracy to commit such offense is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C).

6. Title 18, United States Code, Section 1952 (Travel Act) makes it a crime for anyone to travel in interstate or foreign commerce, or to use the mail, or any facility in interstate or foreign commerce, with intent to commit or facilitate certain unlawful activity, and thereafter perform or attempt to perform that unlawful activity. Title 18, United States Code, Section 1952 is a “specified unlawful activity” pursuant to 18 U.S.C. §§ 1956(c)(7)(A) and 1961(1).

7. Title 18, United States Code, Sections 1341 (Mail Fraud) and 1343 (Wire Fraud) are each “specified unlawful activity” pursuant to 18 U.S.C. §§ 1956(c)(7)(A) and 1961(1).

8. I also have probable cause to believe that this property is subject to seizure and forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(A) because the property was involved in or was traceable to property involved in a violation of 18 U.S.C. §§ 1956 and 1960.

9. Any property, real or personal, which was involved in a transaction in violation of 18 U.S.C. §§ 1956 (Money Laundering) or 1960 (Operating an Unlicensed Money Transmitting Business), or any property traceable to such property is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A).

10. Title 18, United States Code, Section 1956 makes it a crime to knowingly conduct or attempt to conduct a “financial transaction” with proceeds from “specified unlawful activity” (“SUA”) with specific intent to: promote the SUA, conceal or disguise the nature, location, source, ownership, or control of the proceeds; evade reporting requirements; or evade taxes.

11. The purpose of “money laundering” as defined by 18 U.S.C. § 1956 is to disguise the illicit nature of funds by introducing them into legitimate commerce and finance thereby making them “clean.” This financial process is most commonly conducted using three steps referred to as “placement,” “layering,” and “integration.” Typically, the “placement” phase of this financial process occurs when proceeds from illicit sources are placed in a financial institution or business entity. “Layering” takes

place when these funds are then used in seemingly legitimate commercial transactions which makes the tracing of these monies more difficult and distances them from the criminal activity from which they originated. Finally, the “integration” phase is when these funds are then used to promote the unlawful activity or are used for the personal benefit of the money launderers and others.

12. Title 18, United States Code, Section 1960 makes it a crime to knowingly conduct, control, manage, supervise, direct, or own all or part of an unlicensed money transmitting business.

13. The Seized Property is subject to seizure via a civil seizure warrant under 18 U.S.C. §§ 981(a) and 981(b).

FACTS SUPPORTING CIVIL FORFEITURE

14. On June 30, 2022, Henderson Police Department (Henderson PD) officers were working traffic enforcement on US Highway 259 in Mt. Enterprise, Texas. The Henderson PD and the Mt. Enterprise City Marshal’s Office had a written interagency agreement allowing Henderson PD to work traffic enforcement within the city limits of Mt. Enterprise.

15. At approximately 1:38 a.m., Henderson PD officers initiated a traffic stop on a white Nissan Altima displaying Massachusetts license plate number 2ZMR51 for a traffic violation, Texas Transportation Code § 545.104(a), Failure to Signal Lane Change. Officers identified the occupants of the vehicle as Robinisaac SORIANO and Grabriel GALICIA-Mateo. SORIANO was the driver; GALICIA-Mateo was the front seat passenger. During the traffic stop, the occupants of the vehicle were interviewed

separately. SORIANO stated that he and GALICIA-Mateo had been in Houston for a “Bitcoin event.” GALICIA-Mateo stated that they traveled to Houston to visit a friend and denied that the trip was work-related. Officers were provided with a copy of the rental agreement for the Altima and noted that the individual who rented the vehicle was neither SORIANO nor GALICIA-Mateo.

16. Officer requested and were granted verbal consent to search the Altima by both SORIANO and GALICIA-Mateo. Before the search, officers asked if the occupants were traveling with a large amount of currency. SORIANO stated they had “a couple of thousand dollars,” and GALICIA-Mateo stated they had \$14,000.

17. During the search of the vehicle, officers discovered what appeared to be a very large amount of United States Currency. GALICIA-Mateo then stated they were traveling with \$470,000.

18. SORIANO was Mirandized and interviewed. During the interview, SORIANO stated that he had traveled with GALICIA-Mateo to retrieve Bitcoin (BTC) earnings. According to SORIANO, he and GALICIA-Mateo had flown from Pennsylvania to Houston, Texas, where they were picked up at the airport by “Brady.” After they rented the Altima, SORIANO went to one apartment while GALICIA-Mateo and “Brady” “counted the money” at another apartment. After the money was counted, SORIANO and GALICIA-Mateo left Houston in the Altima, bound for Pennsylvania. SORIANO then stated the Seized Property belonged to GALICIA-Mateo.

19. GALICIA-Mateo was Mirandized and interviewed. During the interview, GALICIA-Mateo stated that he and SORIANO had flown to Houston for a three-day trip

to meet one of GALICIA-Mateo's "clients," Brady LIRIANO. GALICIA-Mateo initially stated that the source of the Seized Property was proceeds from the sale of BTC that GALICIA-Mateo and LIRIANO collected. GALICIA-Mateo and LIRIANO allegedly met at the apartment of Brammel LIRIANO, counted the money, and then divided the money between themselves. GALICIA-Mateo then added that some of the money was income from rental properties he owned in Pennsylvania. GALICIA-Mateo was unable to explain how much of the Seized Property was from rental income and how much was from the sale of BTC.

20. GALICIA-Mateo stated that he uses the cryptocurrency exchange Coinbase to purchase BTC and that he owns approximately \$100,000 in BTC.

21. GALICIA-Mateo stated that he was associated with cryptocurrency-based investment platform called GoArbit. According to GALICIA-Mateo, GoArbit guarantees a 1.5% daily return on investments. GALICIA-Mateo explained that he is paid \$300 per new member that he brings to GoArbit. GALICIA-Mateo has been exchanging BTC for approximately one year. In order to exchange US currency for BTC, GALICIA-Mateo takes possession of US currency from investors, exchanges it for BTC, and deposits the BTC in the investors' GoArbit accounts. GALICIA-Mateo admitted that the GoArbit platform "worked like a pyramid scheme." When asked why the investors did not buy BTC directly from a cryptocurrency exchange like Coinbase, GALICIA-Mateo stated it was easier to buy BTC from him due to the taxes and fees associated with cryptocurrency exchanges.

22. When asked for a list of GALICIA-Mateo's BTC customers, GALICIA-Mateo stated that he had receipts in the form of screenshots on his phone. GALICIA-Mateo consented to a search of his phone, and agents were only able to identify screenshots showing transactions totaling \$6,713.00 that GALICIA-Mateo stated were associated with BTC sales. GALICIA-Mateo stated that the remainder of the receipts were in Brady LIRIANO's Coinbase account. GALICIA-Mateo claimed he does not have access to Brady LIRIANO's Coinbase account. GALICIA-Mateo stated 90% of his BTC is stored in Brady LIRIANO's Coinbase account. GALICIA-Mateo then admitted he could not document the source of the Seized Property with the information stored on his phone.

23. During the review of GALICIA-Mateo's phone, agents discovered what appeared to be a sales presentation for GoArbit. The presentation guaranteed a 1.5% daily return on BTC investments.

24. GALICIA-Mateo and SORIANO were released after the interviews were concluded. SORIANO was issued a citation for the traffic violation.

25. HSI Special Agents transported the Seized Property to Southside Bank in Tyler, Texas. The Seized Property was counted and determined to be \$459,890.00.

26. Agents reviewed the website for GoArbit (goarbit.com). The website provides no meaningful information about the company or its practices.

27. Open-source reviews for GoArbit located on Trustpilot.com included the following:

- a. Mario Gonzalez (September 22, 2022): "I want to get my money back. I've invested almost 5000 bucks. They have not responded to my tickets and they just ignore me. If you had an attachment tool I would gladly do it because this is not a reputable company."
- b. Bill Molina (October 4, 2022): "GoArbit is extremely active here in Colombia South America. A friend tried to entice me to invest in this, I looked into it, attended a virtual meeting, and being an old dog, I told my friend to her directly this is a pyramid Ponzi scheme. At 1st she said no, & she insisted and kept on promoting GoArbit. She finally admitted to me that yes perhaps this was a pyramid scheme, but she was going to keep promoting the system for as long as she could until it crashes. For her the system seems to be working, she is currently in Dubai with her family, enjoying the fruits of her labor. Here in Colombia, it's extremely dangerous to involve people in any type of fraudulent schemes, your life is not worth more than lunch and a bullet. The saying goes: If it's too good to be true, then it probably is. Yes it's obvious that a lot of people have made lots of \$\$ with these and other systems. Investing is a risky business, it's a matter of how lucky do you feel? All I can say is, yes, seems like some people have made lots of \$\$ with this, for me this type of investment is way too risky. Perhaps you can be one of the lucky or unlucky ones. Like my friend said, you just don't want to have your \$\$ in it, when it crashes, but you don't know when it will crash, that's the

problem. All I can say about this system and any other similar system is BUYER BEWARE. Look up Bernie Maddoff the king of ponzy schemes.”

c. Kent (February 22, 2022): “Goarbit has a problem lying to their customers, they have conveniently shut down right after withdrawals and now the website is offline. I hope no one invest their money here as they don't answer their tickets and just lie about delays to getting your money. They use your money then disappear without a trace!! Do not trust them!!!!!!”

d. Roger Barnett (July 18, 2022): “It appears, that unless the news I'm reading is wrong, several shill reviews have been posted since goarbit disappeared. A portion of the below article is included:
behindmlm.com/mlm-reviews/goarbit-execs-flee-to-dubai-gofintech-group-reboot/ GoArbit is a simple 200% ROI Ponzi scheme. The introduction of GoToken would appear to be the beginning of a shitcoin exit-scam. That is GoArbit starts paying out in worthless GoTokens, owing to new investment inevitably failing to cover ever-growing withdrawal liability. Details on GoToken are sketchy. Things get even more confusing with the launch of GoArbit Coin (GoCoin) back in January. 1.6 million GoCoins were created on January 16th. By January 20th the balance had been cleaned out to just 95 GoCoins. Whatever GoCoin was, it's already over. GoArbit's current status is equally as

obscure. After the January 2022 Dubai office launch event, nothing much seems to be happening. Traffic to GoArbit's website picked up after the January 2022 Dubai event and have held. Alexa traffic rankings suggest GoArbit Scammers are targeting victims in Colombia (30%), Venezuela (19%) and Peru (12%). GoArbit founder and CEO Maximo Martinez claims to be born in the Dominican Republic. As opposed to having anything to do with business operations, Martinez's move to Dubai is likely groundwork for the inevitable collapse. Through limited extradition treaties and non-regulation of MLM related securities fraud, Dubai provides a safe-haven for scammers like Martinez. For investors looking for news following the Dubai January event, things look bleak. GoArbit's website advises there is no recent news. GoArbit's official FaceBook page was abandoned in September 2021. It's Twitter account was abandoned in March 2020. GoArbit's official linked Instagram account appears to have been hijacked by an affiliate. Comments left on GoArbit's FaceBook page suggest withdrawal problems began around September 2021. Whether they have been rectified or not is unclear."

28. Agents also located the GoArbit app in the Google Play Store. The section "About this App" states, "We are a private equity business team with great specialists in different technological, financial and commercial fields, supporting all our operations in 3 main pillars that are: Arbitrage, Mining and Trading." No other

information is provided. The link to the GoArbit Privacy policy leads to a webpage; no policy or company information can be found on the page. Among the reviews of the GoArbit app are the following:

- a. Waleska Medrano: "I change phone and now it says update app all the time, check on it and I'll change my review. It's impossible, i already had an account now it says is not activated and contact support..."
- b. Jore Jungle: "It's a scam app don't put here your money, they don't need update or reinstall it's not just the issue, it's to scam your money, they are not regulated and a lot of other people has been put the money here and they has disappear, it's not customer services and anything don't put the money!"
- c. Cesar Perez: "Really bad experience, don't use it never, i made a deposit, for the first month it was good but now i can't open the app to take MY MONEY."
- d. El MandalorianoPR: "I invested like 1500\$ in total, today I try login and they just banned my account for no reason! No explanation, no warning, nothing! I will try look for legal acción again them, so DONT TRUST THEM."

29. Agents reviewed Money Services Business (MSB) registrant records at Financial Crimes Enforcement Network (FINCEN) to determine if GALICIA-Mateo or Brady LIRIANO were registered as an MSB. Neither individual is registered with FINCEN as an MSB.

CONCLUSION

30. I submit that this affidavit supports probable cause to forfeit \$459,890.00 in United States Currency which was seized from Grabiél GALICIA-Mateo.

31. Based on my experience and the information herein, I have probable cause to believe the Seized Property constitutes or is derived from proceeds traceable to a violation of any offense constituting “specified unlawful activity,” or a conspiracy to commit such offense, specifically 18 U.S.C. § 1952, 18 U.S.C. § 1341, 18 U.S.C. § 1343, or a conspiracy to commit 18 U.S.C. §§ 1341 or 1343, and is therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C).

32. I also have probable cause to believe that the Seized Property is traceable to a transaction or was involved in transaction in violation of 18 U.S.C. §§ 1956 and 1960 and is therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A).

33. Accordingly, I request the forfeiture of the Seized Property, pursuant to 18 U.S.C. §§ 981(a) and 981(b).

34. The information contained in this Affidavit is based on my personal knowledge and what I have learned from other sources discussed herein.

35. This Affidavit does not purport to set forth all of my knowledge or investigation concerning this matter.

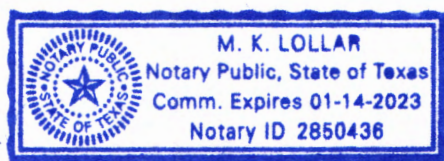
36. I have read the Complaint for Forfeiture concerning the Seized Property, and I verify that the factual matters contained in it are true and correct.

Respectfully submitted,

Burt Reavis

Burton Reavis
Special Agent
Homeland Security Investigations

Subscribed to and sworn before me on this the 4th day of November, 2022.



M K Lollar
Notary Public, State of Texas